

## **Meeting**

(3/20/02)

U.S. Environmental Protection Agency  
Rodenticide Registrants Task Force  
Zinc Phosphide Consortium  
Morningstar Consulting  
Bergeson & Campbell, P.C.

On March 20, 2002, the Agency held a meeting with the Rodenticide Registrants Task Force (RRTF) and a representative of the Zinc Phosphide Consortium to discuss the Agency's Preliminary Comparative Ecological Risk Assessment (PRA) for the Rodenticide Cluster Reregistration Eligibility Decision (RED).

The RRTF and Zinc Phosphide Consortium expressed concern over the release of the comparative risk assessment and requested that the Agency withdraw the document prior to its release for public comment. The RRTF believes that there are serious errors and omissions in the preliminary assessment, and that it is a hazard rather than a risk assessment.

EPA responded that all error only comments submitted during Phase I have been considered and errors corrected. However, the RRTF will provide a list of studies that they believe are critical for inclusion in the comparative assessment, and EFED will determine whether or not those studies were reviewed and taken into consideration during the risk assessment process. The RRTF agreed to submit the list within a week.

The Agency also agreed to address error comments that may not have been included in the (draft) revised risk assessment. Likewise, the Agency has also agreed to look into a request by the RRTF regarding differences among use patterns for those chemicals referenced in the risk assessment. However, EFED stated that those differences have already been addressed in the document. EPA also will consider sharing the response to comments document with the RRTF prior to the release of the PRA.

The Agency has expressed a willingness to present the risk assessment to the Scientific Advisory Panel (SAP), if necessary, in order to get broader feedback on the scientific approach.

The Agency plans to open the public comment period (Phase III) near the end of March.